

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION**

MDL No. 2738 (MAS) (RLS)

**SPECIAL MASTER ORDER NO. 20  
(ADDRESSING MOTION FOR PROTECTIVE  
ORDER REGARDING KCIC'S DOCUMENTS)**

The Special Master and counsel having held a Zoom conference on March 11, 2024, regarding the Motion for Protective Order addressed to J&J's subpoena for KCIC's documents; and this Order intending to confirm the Special Master's rulings; and for all the reasons stated on the record,

IT IS HEREBY ORDERED this 12<sup>th</sup> day of March, 2024, as follows:

1. Plaintiffs' request that the Special Master conduct an in camera relevancy review of KCIC's documents responsive to J&J's subpoena is DENIED;
2. To the extent KCIC has any objections to producing the documents responsive to J&J's subpoena, the objections are OVERRULED. KCIC did not timely serve its objections pursuant to Special Master Order No. 18, and pursuant to the subsequent extension of time the Special Master granted at KCIC's request.
3. By 5:00 p.m. on March 15, 2024, plaintiffs shall produce all evidence to support their privilege claim. J&J may respond by March 20, 2024.

4. Plaintiffs shall promptly produce to J&J all non-privileged KCIC documents  
KCIC produced in response to J&J's subpoena.<sup>1</sup>

By: /s/Joel Schneider  
Judge Joel Schneider (Ret.)  
Special Master

Dated: March 12, 2024

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<sup>1</sup> The Special Master asks that it be served with a hard copy of these documents to assist in its in camera review of the alleged privileged documents.